

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS**

Timothy Kelly, *on behalf of himself and all
others similarly situated,*

Plaintiff,

v.

R. R. Donnelley & Sons Company,

Defendant.

Case No. 1:22-cv-04260

NOTICE OF SETTLEMENT

The Parties hereby give the Court notice that they have reached a settlement in principle on a classwide basis. The Parties are finalizing the terms of the settlement and anticipate presenting a motion for preliminary approval of class action settlement within 45 days. The Parties respectfully request that the Court stay all case deadlines and reserve ruling on Defendant's pending motion to dismiss in the interim.

Dated: April 25, 2023

Respectfully Submitted,

By: /s/ Gary M. Klinger

Gary M. Klinger
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